

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.¹

Chapter 11

**AMENDED FINAL APPLICATION OF FREMSTAD LAW FIRM FOR THE
ALLOWANCE OF FEES AND EXPENSES AS SPECIAL LITIGATION COUNSEL
FOR THE DEBTORS THROUGH AUGUST 20, 2025**

1. Mark Western and Fremstad Law Office (collectively, “Fremstad”) make this Amended Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as special litigation counsel for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) through August 20, 2025 pursuant to 11 U.S.C. § 330. This Application is an Amended Fee Application that reduces fees for travel time as set forth in pages 3 and 4, below.

¹ In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors’ address is 400 10th Street SE, Minot, ND 58701 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

2. In support of this Amended Application, Fremstad respectfully states as follows:

JURISDICTION

3. This Court has jurisdiction over this Amended Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. 8 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

5. This Amended Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court’s order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

BACKGROUND

6. On February 3, 2025, the Debtors filed an application to employ Fremstad as special litigation counsel for the Debtors effective February 3, 2025. (ECF No. 218.) The Court approved the application to employ Fremstad on February 20, 2025. (ECF No. 233.) On September 18, 2025, the undersigned counsel filed and served the Declaration of Patrick Finn (ECF No. 468) which outlines additional conflict matters for which employment of Fremstad as special litigation counsel

was necessitated due to conflicts as required by paragraphs 8 and 9 of the approval of Fremstad's Application (ECF No. 233). A copy of that order and declaration are attached as **Exhibit A**.

7. On the Petition Date, the Debtors filed a motion for an order establishing interim compensation procedures. (ECF No. 11.) The Court entered an order on August 14, 2024, granting the motion and allowing professionals, including Fremstad, to file applications for compensation. (ECF No. 72.) A copy of that order is attached as **Exhibit B**.

8. This is Fremstad's final amended application for allowance of fees and expenses under 11 U.S.C. § 331. Fremstad received court approval for the following prior fee applications:

Fee Application Amount	Date of Order Approving	Docket No.
\$6058.50	May 1, 2024	281
\$4800.30	June 16, 2024	374
\$2425.50	July 15, 2025	399
\$8593.50	August 19, 2025	443
\$5761.50	September 9, 2025	459
\$27,639.30		

9. Duplication of the \$2425.50 fees was inadvertently included in the \$8593.50 bill so overpayment of \$2425.50 resulted. That amount has been credited/offset from outstanding Sheyenne/Gateway amounts reflected in Paragraph 12 (infra) by way of an asterisk as to each proceeding.

10. Fremstad believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

RELIEF REQUESTED

11. By this Amended Application, Fremstad requests allowance of fees for unbilled professional services rendered during these Chapter 11 cases through August 20, 2025, in the

amount of **\$6524.24** and reimbursement of expenses in the amount of **\$350.00**, for a total of **\$6874.24**.

12. The professional services rendered by Fremstad are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

Adversary Proceeding Against Sheyenne 32 North, LLC et al.: \$1270.87

Services August 1, 2025 through August 20, 2025, include drafting, reviewing, finalizing, serving and filing pleadings; analyzing issues and monitoring status; reviewing applicable law/rules; communication with other counsel and client representatives. (All services and expenses have been equally applicable to and therefore pro rated to each adversary matter (one-half to Sheyenne 32 North, LLC and one-half to Epic Gateway, LLC)).

Based upon 8th Circuit practice, e.g., In Re McKeeman, 236 B.R. 667, 672-73, an offset is applied to bill for the undersigned counsel's travel time at 50% for the Hearing in Minneapolis on August 6, 2025. Travel time August 6 and 7 (\$1275.00 + \$1312.50 divided in half = \$1293.75). Each Adversary Proceeding (Gateway and Sheyenne) has a commensurate offset of \$646.88).

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Mark Western	7.05	2025	\$375.00	\$2643.75
Terri Bourcy Smith	2.95	2025	\$165.00	486.75
SUBTOTAL	8.45			\$3130.50
*Less overpayment				-\$1212.75
Less 50% travel time				-\$646.88
FEES OUTSTANDING				\$1270.87
Blended Hourly Rate:	\$270.00			

Adversary Proceeding Against Gateway, LLC et al.: \$1270.87

Services August 1, 2025 through August 20, 2025, include drafting, reviewing, finalizing, serving and filing pleadings; analyzing issues and monitoring status; reviewing applicable law/rules; communication with other counsel and client representatives. (All services and expenses have been equally applicable to and therefore pro rated to each adversary matter (one-half to Sheyenne 32 North, LLC and one-half to Epic Gateway, LLC)).

Based upon 8th Circuit practice, e.g., In Re McKeeman, 236 B.R. 667, 672-73, an offset is applied to bill for the undersigned counsel's travel time at 50% for the Hearing in Minneapolis on August 6, 2025. Travel time August 6 and 7 (\$1275.00 + \$1312.50 divided

in half = \$1293.75). Each Adversary Proceeding (Gateway and Sheyenne) has a commensurate offset of \$646.88).

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Mark Western	7.05	2025	\$375.00	\$2643.75
Terri Bourcy Smith	2.95	2025	\$165.00	486.75
SUBTOTAL	8.45			\$3130.50
*Less overpayment				-\$1212.75
Less 50% travel time				-\$646.88
FEES OUTSTANDING				\$1270.87
Blended Hourly Rate:	\$270.00			

Adversary Proceeding Against Greenfield Commons et al.: \$1470.00

Services June 1, 2025, through August 20, 2025, include drafting, reviewing, finalizing, serving and filing pleadings; analyzing issues and monitoring status; reviewing applicable law/rules; communication with other counsel and client representatives. (All services and expenses have been equally applicable to and therefore pro-rated to each adversary matter (one-half to Sheyenne 32 North, LLC and one-half to Epic Gateway, LLC)).

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Mark Western	3.7	2025	\$375.00	\$1387.50
Terri Bourcy Smith	0.5	2025	\$165.00	82.50
TOTAL	8.45			\$1470.00
Blended Hourly Rate:	\$270.00			

Adversary Proceeding Against Unite REH et al.: \$2,862.50

Services July 30, 2025, through August 20, 2025, include drafting, reviewing, finalizing, serving and filing pleadings; analyzing issues and monitoring status; reviewing applicable law/rules; communication with other counsel and client representatives. (All services and expenses have been equally applicable to and therefore pro-rated to each adversary matter (one-half to Sheyenne 32 North, LLC and one-half to Epic Gateway, LLC)).

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Mark Western	5.6	2025	\$375.00	\$2100.00
Terri Bourcy Smith	2.5	2025	\$165.00	412.50
TOTAL	8.45			\$2512.50
Blended Hourly Rate:	\$270.00			

TOTAL POST-PETITION FEES: \$2512.50

13. **Reimbursement of Expenses.** In the course of this representation, Fremstad has also incurred expenses detailed on **Exhibit C**, and requests allowance thereof as follows:

<u>Expenses</u>	<u>Amount</u>
US District Court Filing fee (Unite REH)	\$350.00
TOTAL	\$ 350.00

TOTAL EXPENSES: \$350.00

14. All services for which fees are requested by Fremstad were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

15. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Fremstad, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Fremstad has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.

WHEREFORE, Fremstad respectfully requests that the Court enter an order:

A. Allowing Fremstad's to date unbilled fees incurred through August 20, 2025, in the amount of **\$6524.24**, and expenses in the amount of **\$350.00**, totaling **\$6874.24**;

B. Authorizing the Debtors to pay Fremstad such allowed post-petition fees and expenses;

C. Granting administrative expense priority to Fremstad's allowed fees and expenses;
and

D. Granting such other and further relief as may be just and proper.

Dated: October 8, 2025

/s/ Mark Western

Joel M. Fremstad (ND ID #05541)

Mark Western (ND ID# 06181)

FREMSTAD LAW FIRM

P.O. Box 3143

Fargo, North Dakota 58108-3143

Phone: (701) 478-7620

joel@fremstadlaw.com

mark@fremstadlaw.com

ATTORNEYS FOR DEBTORS

DECLARATION

I, Mark Western an attorney at Fremstad Law Firm, declare under penalty of perjury that the foregoing Application of Fremstad Law Firm for Allowance of Fees and Expenses as Special Litigation Counsel for the Debtors is true and correct according to the best of my knowledge, information, and belief.

Dated: October 8, 2025

/s/ Mark Western

Mark Western

EXHIBIT A

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

**U.S. Bankruptcy Court
District of North Dakota**

Notice of Electronic Filing

The following transaction was received from vck entered on 2/20/2025 at 3:21 PM CST and filed on 2/20/2025

Case Name: EPIC Companies Midwest, LLC

Case Number: 24-30281

Document Number: 233

Docket Text:

Order Approving Application to Employ Joel M. Fremstad, Mark Western and Fremstad Law Firm as special litigation counsel for the Debtors (Related Doc # [218]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. §§ 329, 330. Applicant must also comply with Local Rules. Applicant is also granted authority to apply for fees and expenses pursuant to #[72] Order Establishing Procedures for Interim Compensation and Reimbursement for Expenses for Retained Professionals. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings. (Text order only). Signed on 2/20/2025 (vck)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

DECLARATION OF PATRICK FINN

[¶ 1] Patrick Finn, being duly sworn, states that I am a Partner of Lighthouse Management Group, Inc., the Chief Restructuring Officer for EPIC Companies Midwest 2023, LLC and EOLA Capital, LLC.

[¶ 2] On or about February 3, 2025, I, on behalf of the debtors, filed a Motion for an Order Authorizing the Debtors to employ Fremstad Law as Special Litigation Counsel for the Debtors. (Doc. ID No. 218). This Court granted the Application to Employ Fremstad Law on or about February 20, 2025 (Doc. ID No. 233).

[¶ 3] The original purpose for Special Litigation Counsel was to negotiate and potentially litigate with certain EPIC related projects that involved Sheyenne 32 North, LLC, Sheyenne 32 South, LLC, Sheyenne 32 South Residential, LLC, EPIC Gateway Real Estate Holdings, LLC, EPIC Gateway, LLC, and EPIC Gateway North Real Estate Holdings, LLC, and because of potential other conflicts with the Debtors' primary bankruptcy counsel that may arise. Id., at ¶¶ 8-10.


[¶ 4] A potential conflict matter has arisen with respect to the another Adversary Proceeding related to creditor Cornerstone Bank and as such, I am requesting that Fremstad

Case 24-30281 Doc 468 Filed 09/18/25 Entered 09/18/25 13:11:22 Desc Main Document Page 2 of 2

Law be permitted to submit fee applications for legal services it performed in the instant matter and other conflict matters that have arisen or will arise.

[¶ 5] I declare under penalty of perjury under the laws of the State of North Dakota, that the foregoing is true and correct. Executed on 9 day of September, 2025.

[¶ 6] FURTHER YOUR DECLARANT SAYETH NAUGHT.



Patrick Finn
Partner, Lighthouse Management Group, Inc.
Chief Restructuring Officer for the Plaintiffs

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

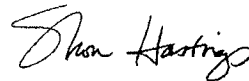
IT IS ORDERED that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

IT IS FURTHER ORDERED that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. ("Lighthouse") for fees and expenses on a bi-weekly basis.

IT IS FURTHER ORDERED that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the "Notice Parties") a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

IT IS FURTHER ORDERED that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE
UNITED STATES BANKRUPTCY COURT

EXHIBIT B

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EXHIBIT C



INVOICE

Invoice # 18543
Date: 09/17/2025
Due Upon Receipt

Fremstad Law

PO Box 3143
Fargo, ND 58108

EPIC Gateway & Sheyenne Adversary Actions

Bankruptcy

Date	Attorney	Notes	Quantity	Rate	Total
08/01/2025	MW	Email correspondence to Patrick Finn summarizing call with attorney Singer regarding Rule 408 issues; Follow up emails regarding same;	0.30	\$375.00	\$112.50
08/01/2025	MW	Review draft corporate ownership statements for filing in each Adversary Proceeding; Provide instructions for Paralegal Smith to file same on Monday;	0.20	\$375.00	\$75.00
08/04/2025	MW	Emails to and from all counsel regarding personal appearance at Hearing on Thursday;	0.10	\$375.00	\$37.50
08/04/2025	TBS	Receive, download and review order granting motion to approve settlement re Fargo South Hospitality, reply of no objection to application [405], reply of no objection to application [402]; Receive, download and review reply re objection to motion to consolidate re Sheyenne and Gateway adversary actions; review, file and serve corporate ownership statement for Epic Companies Midwest, Epic Companies Midwest 2023, LLC, EOLA Capital, LLC, and EC West Fargo, LLC in Gateway; review, file and serve corporate disclosure statement for EOLA Capital, LLC and EPIC Companies Midwest 2023, LLC for Gateway; phone call with bankruptcy clerk Carol;	0.90	\$165.00	\$148.50
08/04/2025	MW	Review Corporate Ownership Statement ECF filings in Sheyenne and Gateway APs;	0.10	\$375.00	\$37.50
08/05/2025	TBS	Receive, download and review recent court filings; conference with Mark Western; prepare materials for use at upcoming motion hearing; review email from Patrick Finn, download summary judgment pleadings and update binder for use at hearing on motions;	2.40	\$165.00	\$396.00

Invoice # 18543 - 09/17/2025

08/05/2025	MW	Review of Motion/Notice of compromise in 36 & Veterans Proceeding; Emails to and from all counsel regarding potential deposition dates for Berning et al in late September;	0.30	\$375.00	\$112.50
08/05/2025	MW	Cursory review of MSJ and Consolidation briefing to prepare for oral argument on Thursday;	0.30	\$375.00	\$112.50
08/06/2025	MW	Review ECF filings regarding no objection to consolidation;	0.10	\$375.00	\$37.50
08/06/2025	TBS	Receive, download and review order granting motion to consolidate and amended chapter 11 plan; conference with Mark Western; review and revise declaration of Patrick Finn;	0.30	\$165.00	\$49.50
08/06/2025	MW	Prepare declaration of Finn regarding other conflict work for Fremstad;	0.20	\$375.00	\$75.00
08/06/2025	MW	Prepare for Hearing on Motion to Consolidate; Review of summary judgment issues in other proceedings;	0.70	\$375.00	\$262.50
08/06/2025	MW	Travel to Minneapolis for Hearing;	3.40	\$375.00	\$1,275.00
08/07/2025	MW	Prepare for consolidation hearing;	1.10	\$375.00	\$412.50
08/07/2025	TBS	Receive, download and review notice of transfer of claim Smith to Argo;	0.20	\$165.00	\$33.00
08/07/2025	MW	Further preparations and attend Hearing at Minneapolis Bankruptcy Court; Conference with Patrick Finn regarding issues in adversary proceedings;	3.00	\$375.00	\$1,125.00
08/07/2025	MW	Travel from Minneapolis after Hearing;	3.50	\$375.00	\$1,312.50
08/08/2025	MW	Emails to and from Patrick Finn regarding global resolution issues;	0.20	\$375.00	\$75.00
08/11/2025	TBS	Receive, download and review claim/transfer of claim notices, receive, download and review minutes of hearings; prepare draft fifth fee application;	0.80	\$165.00	\$132.00
08/11/2025	MW	Review and approve draft of fee application no 5;	0.20	\$375.00	\$75.00
08/12/2025	TBS	Receive, download and review no objection to applications and supplemental affidavit of Fredrikson;	0.10	\$165.00	\$16.50
08/13/2025	TBS	Review, revise and finalize fifth fee application, supporting exhibits and notice; electronically file and serve;	0.80	\$165.00	\$132.00
08/13/2025	MW	Review ECF of Transfer of Claim;	0.10	\$375.00	\$37.50
08/18/2025	MW	Email correspondence to Patrick Finn regarding	0.20	\$375.00	\$75.00

Invoice # 18543 - 09/17/2025

		Rule 408 issues; Email correspondence to Michael Gust regarding Rule 408 issues;			
08/19/2025	MW	Review of ECF regarding payment to Lighthouse;	0.10	\$375.00	\$37.50
08/19/2025	TBS	Receive, download and review recent pleadings/ orders filed;	0.10	\$165.00	\$16.50
08/20/2025	TBS	Receive, download and review recent pleadings;	0.30	\$165.00	\$49.50

Time Keeper	Quantity	Rate	Total
Mark Western	14.1	\$375.00	\$5,287.50
Terri Smith	5.9	\$165.00	\$973.50
		Subtotal	\$6,261.00
		Total	\$6,261.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
18543	09/17/2025	\$6,261.00	\$0.00	\$6,261.00
			Outstanding Balance	\$6,261.00
			Total Amount Outstanding	\$6,261.00

Please make all amounts payable to: Fremstad Law

Payment is due upon receipt.

Credit \$2425.50

due: \$3835.50

Credit 1293.76

DUE \$2541.74

Travel Time Reduced 50%



INVOICE

Invoice # 18549
Date: 09/19/2025
Due Upon Receipt

Fremstad Law

PO Box 3143
Fargo, ND 58108

EPIC Greenfield Commons Adversary Action

Garnishment

Date	Attorney	Notes	Quantity	Rate	Total
06/16/2025	MW	Prepare for and attend conference with attorney Steven Kinsella regarding conflict counsel regarding Cornerstone Garnishment; Review of correspondence from attorney Krings to attorney Kinsella; Prepare substantive follow up/summary correspondence to attorney Kinsella and client outlining scope of representation and plan of attack;	0.60	\$375.00	\$225.00
06/16/2025	MW	Review of pertinent documents to garnishment provided by attorney Nixon; Email correspondence to attorney Krings requesting phone visit;	0.30	\$375.00	\$112.50
06/18/2025	MW	Email correspondence to and from attorney Krings; Review telephone message from attorney Krings; Telephone conference with attorney Krings regarding garnishment issue;	0.30	\$375.00	\$112.50
06/18/2025	MW	TEAMS conference with Patrick Finn regarding garnishment issue;	0.20	\$375.00	\$75.00
06/18/2025	TBS	Review of Cornerstone Bank garnishment with Attorney Western, prepare initial draft of Notice of Limited Appearance and Affidavit of Service re the same;	0.30	\$165.00	\$49.50
06/18/2025	MW	Research and communication with paralegal Burlingame regarding issues related to Cornerstone Garnishment Summons; Prepare e-mail memorandum of law for Patrick Finn's review regarding same;	0.50	\$375.00	\$187.50
06/18/2025	MW	Follow up phone conference with Patrick Finn regarding strategy for follow up on Garnishment Summons with attorney Krings; Review of underlying garnishment pleadings; Telephone	0.70	\$375.00	\$262.50

Invoice # 18549 - 09/19/2025

		message and email correspondence to attorney Nixon seeking confirmation of service date of the Garnishment Summons; Follow up email to Patrick Finn regarding service of Garnishment date issue; Telephone conference with attorney Krings; Email report and draft correspondence to attorney Krings regarding same; Prepare Notice of Limited Appearance in garnishment proceeding;			
06/19/2025	TBS	E-filing of Notice of Limited Appearance and Affidavit of Service re the same;	0.10	\$165.00	\$16.50
06/24/2025	MW	Review of response to garnishment summons; Email correspondence to Patrick Finn regarding contents of Garnishment Disclosures; Telephone conference with Mr. Finn regarding same;	0.30	\$375.00	\$112.50
07/01/2025	MW	Telephone conference with Patrick Finn regarding garnishment issues; Telephone call and e-mail correspondence to attorney Krings;	0.30	\$375.00	\$112.50
07/02/2025	MW	Emails to and from attorney Krings; Prepare for and attend telephone conference with Krings regarding global issues;	0.30	\$375.00	\$112.50
07/02/2025	MW	Telephone conference with Patrick Finn regarding next steps in this matter;	0.20	\$375.00	\$75.00
07/30/2025	TBS	Conference with Mark Western, review declaration of Patrick Finn;	0.10	\$165.00	\$16.50

Time Keeper	Quantity	Rate	Total
Mark Western	3.7	\$375.00	\$1,387.50
Terri Smith	0.5	\$165.00	\$82.50
		Subtotal	\$1,470.00
		Total	\$1,470.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
18549	09/19/2025	\$1,470.00	\$0.00	\$1,470.00
			Outstanding Balance	\$1,470.00

Invoice # 18549 - 09/19/2025

Total Amount Outstanding \$1,470.00

Please make all amounts payable to: Fremstad Law

Payment is due upon receipt.



INVOICE

Invoice # 18544
Date: 09/17/2025
Due Upon Receipt

Fremstad Law

PO Box 3143
Fargo, ND 58108

EPIC Unite REH

General

Services

Date	Attorney	Notes	Quantity	Rate	Total
07/30/2025	MW	Review of email correspondence from Patrick Finn and additional documents regarding EPIC Unite adversary proceeding;	0.30	\$375.00	\$112.50
07/30/2025	TBS	Review emails and documents from Patrick Finn;	0.10	\$165.00	\$16.50
07/30/2025	MW	Review multiple emails from Patrick Finn to URE stakeholders seeking resolution to no avail;	0.10	\$375.00	\$37.50
08/12/2025	MW	Prepare Complaint;	1.40	\$375.00	\$525.00
08/12/2025	MW	Phone conference with Patrick Finn regarding issues related to complaint and litigation;	0.50	\$375.00	\$187.50
08/14/2025	MW	Prepare Complaint; Review Promissory Notes and other additional documents; Review and revise; Email correspondence to Patrick Finn regarding same;	2.60	\$375.00	\$975.00
08/17/2025	MW	Review email correspondence from Patrick Finn regarding Unite edits;	0.10	\$375.00	\$37.50
08/18/2025	MW	Review and analyze edits made to draft Complaint by Patrick Finn; Email correspondence to Patrick Finn regarding same; Make revisions to Complaint and conference with paralegal regarding filing issues;	0.20	\$375.00	\$75.00
08/18/2025	TBS	Review emails to/from Patrick Finn, review and revise draft complaint; conference with Mark Western;	0.50	\$165.00	\$82.50
08/19/2025	TBS	Finalize complaint and initiate adversary action with US Bankruptcy Court;	0.80	\$165.00	\$132.00

Invoice # 18544 - 09/17/2025

08/19/2025	MW	Confirm filing of Complaint; Email correspondence to Patrick Finn regarding same; Email correspondence to attorney Singer with courtesy copy of Complaint;	0.20	\$375.00	\$75.00
08/20/2025	TBS	Receive, download and review summons; review rules re service of summons and complaint; prepare certificate of service, serve summons and complaint on registered agent and attorney Singer via US mail; electronically file certificate of service; email attorney Singer; email Patrick Finn;	1.10	\$165.00	\$181.50
08/20/2025	MW	Review of Federal Rules of Bankruptcy Procedure as to waiver of service and admission of service; Email correspondence to attorney Singer regarding same issues;	0.20	\$375.00	\$75.00
				Services Subtotal	\$2,512.50

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	08/19/2025	US Bankruptcy Court filing fee for adversary complaint;	1.00	\$350.00	\$350.00
				Expenses Subtotal	\$350.00

Time Keeper	Quantity	Rate	Total
Mark Western	5.6	\$375.00	\$2,100.00
Terri Smith	2.5	\$165.00	\$412.50
		Subtotal	\$2,862.50
		Total	\$2,862.50

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
18544	09/17/2025	\$2,862.50	\$0.00	\$2,862.50
			Outstanding Balance	\$2,862.50
			Total Amount Outstanding	\$2,862.50

Invoice # 18544 - 09/17/2025

Please make all amounts payable to: Fremstad Law

Payment is due upon receipt.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**NOTICE OF APPLICATION OF FREMSTAD LAW FIRM FOR ALLOWANCE OF
FEES AND EXPENSES AS SPECIAL LITIGATION COUNSEL FOR THE DEBTORS
THROUGH AUGUST 20, 2025**

TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

1. **NOTICE IS HEREBY GIVEN** that Fremstad Law Firm, as special litigation counsel for the Debtors, has filed its application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **October 29, 2025, which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served are deemed waived.

Dated: October 9, 2025

/s/ Mark Western

Joel M. Fremstad (ND ID #05541)

Mark Western (ND ID# 06181)

FREMSTAD LAW FIRM

P.O. Box 3143

Fargo, North Dakota 58108-3143

Phone: (701) 478-7620

joel@fremstadlaw.com

mark@fremstadlaw.com

ATTORNEYS FOR DEBTORS